

As discussed in the Application, dPi Teleconnect is a Competitive Local Exchange Carrier ("CLEC") and Interexchange Carrier ("IXC") that provides pre-paid residential local telephone, domestic long distance, and dial-up Internet access services. dPi Teleconnect holds blanket domestic Section 214 authority and certificates of public convenience and necessity or equivalent authorizations to provide local, interexchange and/or other intrastate telecommunications services on a competitive basis in 41 states. By and through its subsidiaries and affiliates, Amvensys is a provider of business process outsourcing services, including receivables and document management services, database services, bill payment and processing services, and third-party verification services to various companies across several sectors, including the energy and telecommunications industries.

On October 16, 2009, Rent-A-Center East, Inc. ("Rent-A-Center"), dPi Teleconnect, and Amvensys Technologies, Inc. (a wholly-owned subsidiary of Amvensys) entered into an Ownership Interest Purchase Agreement ("Agreement") whereby Amvensys Technologies, Inc. agreed to purchase all of the membership interests in dPi Teleconnect. The Agreement was consummated and Amvensys took control of dPi Teleconnect on November 17, 2009 (the "Closing Date").³ The Applicants' failure to obtain Commission consent for this transaction prior to consummation was inadvertent. Counsel to Amvensys and dPi Teleconnect at the time was not aware of the Applicants' obligation under the Act and the Commission's Rules to obtain approval from the Commission before transferring control of a company holding blanket domestic Section

³ Amvensys Technologies, Inc. assigned its ownership interests in dPi Teleconnect to Amvensys simultaneous with closing on the purchase of dPi Teleconnect from Rent-A-Center.

214 authority. The Applicants only recently became aware of the requirement, in the course of addressing other FCC compliance matters for other Amvensys subsidiaries. The Applicants have taken steps to correct this deficiency by filing the Application and this STA Request. The Applicants very much regret this error and any inconvenience it may cause the Commission or Commission staff.

Grant of this STA Request will serve the public interest, as it will allow dPi Teleconnect to continue providing uninterrupted telecommunications services to its customers. The Applicants note that the sale of dPi Teleconnect to Amvensys was transparent to the customers of dPi Teleconnect at closing. In particular, the transaction did not affect the rates, terms and conditions under which the then-current customers of dPi Teleconnect received service immediately following closing, nor did the transaction result in any discontinuance of service. Also, dPi Teleconnect has continued to operate pursuant to its existing domestic Section 214 authorization and applicable state authorizations. Furthermore, the sale of dPi Teleconnect to Amvensys has served the public interest. The financial, technical, and managerial resources that Amvensys has brought to dPi Teleconnect has enhanced the ability of dPi Teleconnect to compete in the telecommunications marketplace.

The Applicants acknowledge that grant of this STA Request will not prejudice any action the Commission may take on the Application and that, once granted, the STA may be revoked on the Commission's own notice, without hearing. The Applicants

further acknowledge that grant of an STA and the Application will not preclude enforcement action.

Respectfully submitted,

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